

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JENNIFER EDMONDS, on behalf of herself and  
all others similarly situated,

Plaintiff(s),

-against-

CAPITAL ACCOUNTS, LLC and JOHN DOES  
1-25,

Defendant(s).

C.A. No: 2:19-cv-02490-HB

**JURY TRIAL DEMANDED**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that Plaintiff will move before the Honorable Joshua D. Wolson, United States District Judge, United States District Court for the Eastern District of Pennsylvania on a date to be determined and noticed to all parties for an Order pursuant to Rule 55 of the Federal Rules of Civil Procedure granting a default judgment against defendant by reason of their failure to answer the Complaint in this action. In support of this Motion, Plaintiff relies upon the contemporaneously filed Memorandum of Law in Support of Plaintiff's Motion for Default Judgment, and the contemporaneously filed Declaration of Robert P. Cocco Esq. in Support of Plaintiff's Motion for Default Judgment, together with the exhibits annexed hereto, and the Complaint filed herein.

Plaintiff attaches the following in support of this motion:

A. Declaration of Robert P. Cocco including attachments thereto as follows:

Exhibit 1: Time Records for this matter

Exhibit 2: Itemization of Costs for this matter

## B. Memorandum of Law

Plaintiff's counsel fees are summarized below:

	Hours	Rate	
Robert P. Cocco	4.2	\$530	\$2,226.00
Costs:			\$ 455.25
Subtotal (costs and fees):			\$2,681.25
Statutory Damages			\$1,000.00
Total Award			\$3,681.25

The reasonableness of the hours listed above is based on Plaintiff counsel's time records which are attached hereto, and which reflect the hours spent on the instant litigation. As detailed in the attached documents, the work performed was all reasonably necessary and the hourly rates are commensurate with the experience, skills, and qualifications of the individuals performing the task and constitute the reasonable, fair market rates of the individuals involved. The hours set forth in the time records are not "excessive, redundant or unnecessary."

Dated: Jan. 27, 2020

/s/ Robert P. Cocco

Robert P. Cocco, Esq. (Pa. Id No. 61907)

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